

EXHIBIT A

PEOPLES
ENERGY
Peoples Gas
North Shore Gas

August 8, 2003

Via UPS

David P. Gaughan, Esq.
6687 N. Northwest Highway
Chicago, Illinois 60631

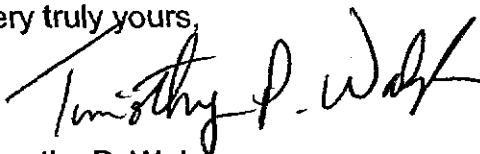
Re: Ronan Heaney v. The Peoples Gas Light and Coke Company
("Peoples Gas"); Docket No. 02-0384

Dear Mr. Gaughan:

Enclosed is The Peoples Gas Light and Coke Company's First Set of Data Requests to Complaint. Pursuant to the Commission's Rules of Practice Sections 200.335 through 200.430 and the schedule set by ALJ Sainsot at the July 24, 2003 status hearing, please provide your responses to me by September 5, 2003.

If you have any questions regarding any of the data requests, please contact me at telephone (312) 240-4454, facsimile (312) 729-7912 or e-mail twalsh@pecorp.com.

Very truly yours,



Timothy P. Walsh
An Attorney for
The Peoples Gas Light and Coke Company

Enclosures

cc: Claudia Sainsot, Administrative Law Judge (w/o attch.)
M. Greene (w/o attach)
K. Staley

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Ronan Heaney)	
-vs-)	
The Peoples Gas Light and Coke Company)	
)	02-0384
Complaint as to overcharged bill - based upon)	
meter reading that was clearly overstated in)	
Chicago, Illinois.)	

RESPONDENT'S FIRST SET OF DATA REQUESTS TO COMPLAINANT

The following is The Peoples Gas Light and Coke Company's First Set of Data Requests to Complainant.

DEFINITIONS AND GUIDELINES

The following definitions and guidelines apply in full to all of the documents, data, materials and answers sought herein:

A) In answering these data requests, furnish all information that is available to Complainant including information in the possession, custody or control of Complainant's agents, and representatives, all others from whom Complainant may freely obtain it, and Complainant's attorneys and investigators.

B) Each data request should be answered based upon Complainant's knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

C) If Complainant or Complainant's attorney has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals.

D) If Complainant or Complainant's attorneys do not have possession, custody, or control of the originals of the documents requested, please produce copies that are in the possession, custody, or control, however made, of Complainant or any of Complainant's attorneys. If any document requested is not in Complainant's possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

E) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

F) In providing Complainant's responses, please start each response on a separate page and set forth in full, at the top of the page, the request that is being answered.

G) Please number all documents and work papers that are provided in response to this data request.

H) For each numbered item of this data request, please identify any witness, other than Complainant, that may be responsible for answering cross-examination requests regarding the numbered item.

I) Each data request remains active throughout this proceeding. If a document comes into existence, or if Complainant obtains any further information, subsequent to the service of Complainant's response to these data requests, please provide such document or information as part of a supplemental response hereto.

J) Please respond to all data requested by September 5, 2003.

K) As used in the data requests, the term "document" includes all materials subject to discovery pursuant to Illinois S.Ct.Rul. 214 (adopted by the Commission at 83 Ill.Adm.Code §200.360(c), including the original and non-identical copies and drafts e.g., copies with notes, editing marks, modifications, additions, or deletions) of all recorded or graphic matter, whatsoever, whether in written or electronic form.

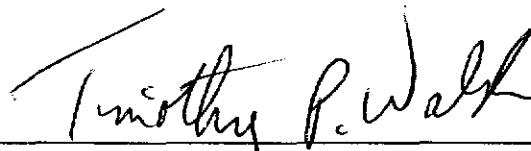
L) For all other terms in this data request, please use the definitions contained in the Public Utilities Act (the "Act"), 220 ILCS 5/1-101, *et seq.*, or the Commission's Rules, 83 Ill.Adm.Code 100, *et seq.*, or if not defined therein please use the plain and ordinary meaning of the term.

- 1.1. Please provide copies of any and all documents of any kind, including but not limited to, bills, analysis, deposits, payment arrangements, applications or requests for service, transfer, and correspondence that you received from Respondent regarding the account that is the subject matter of the Complaint during the period beginning and including December 1, 2000 through the present.
- 1.2 Please provide copies of any and all documents of any kind, including but not limited to, investigations, reports, analyses and correspondence, prepared by Complainant, prepared at Complainant's request or of which Complainant has knowledge, regarding the gas usage or billings that are subject matter of the Complaint.
- 1.3 Please provide copies of any and all documents of any kind, including but not limited to, investigations, reports, analyses and correspondence, prepared by Complainant, prepared at Complainant's request or of which Complainant has knowledge, regarding the gas piping design(s), meter installations, gas appliances, gas appliance installations or mechanical design of 4314-28 W. Irving Park Rd.
- 1.4 Did Complainant or Complainant's representatives receive any calls, make any calls, have any conversations, receive any correspondence, or have any other communication with Respondent or Respondent's representative regarding the account that is the subject matter of the Complaint, including but not limited to, the account status, estimated billings, estimated meter readings, payment arrangements, bills, analysis or transferring the account?

- 1.5 If the answer to question 1.4 is in the affirmative, please describe in detail the date of each such contact, the name of person(s) that participated in the conversation or communication, and the substance of the conversation or communication.
- 1.6 Please provide the following information about all gas appliances at the 4314-28 W. Irving Park Rd. during the period beginning and including December 1, 2000 through the present.
- a) Type of appliance, for example, furnace, boiler or hot water heater;
 - b) Unit each appliance serves;
 - c) Actual or approximate date of installation;
 - d) Actual or approximate date of removal;
 - e) Make;
 - f) Model;
 - g) Year;
 - h) Serial number; and,
 - i) Btu rating.
- 1.7 Please describe:
- a. the layout of 4314-28 W. Irving Park Rd. including the types of units, the number of room(s) in each unit and their size(s) (by square footage or cubic footage) and their usage (e.g., apartment or store);
 - b. how each room at the Premises uses and/or is supplied or uses heat, hot water, cooking gas or any other energy using appliance; and
 - c. for each unit please describe change, if any, to the size or layout during the period beginning and including December 1, 2000 to the present concerning your answers to 1.7(a) and 1.7(b) above.
- 1.8 This question relates to Paragraph 3 of the attachment to the Complaint. Please provide:
- a. dates and the name(s) of contractor(s) that supplied, installed or retrofitted any and all appliances referred to in Paragraph 3 of the Complaint;

- b. any and all records, e.g., invoices, bills, canceled checks and contracts, memorializing the transactions;
 - c. all mechanical drawings, schematics, designs, details, photographs or other representation of the pre- and post-installation piping and appliance installations.
- 1.9 Has any gas appliance or piping work been undertaken or completed at 4314-28 W. Irving Park Rd. subsequent to the installation described in Paragraph 3 of the attachment to the Complaint?
- 1.10 If your answer to question 1.7 is yes, Please provide:
- d. dates and the name(s) of contractor(s) that supplied, installed or retrofitted any and all piping and appliances subsequent to the installations referred to in Paragraph 3 of the Complaint;
 - e. any and all records, e.g., invoices, bills, canceled checks and contracts, memorializing the transactions;
 - f. all mechanical drawings, schematics, designs, details, photographs or other representation of the pre- and post-installation piping and appliance installations.

Respectfully submitted,



Timothy P. Walsh
An Attorney for

The Peoples Gas Light and Coke Company

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Timothy P. Walsh
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Dated this 8th day of
August 2003, at Chicago, Illinois